

EXHIBIT 16

STEPHEN N. ZACK AFFIDAVIT

I, Stephen N. Zack, being duly sworn, do hereby state under oath that the following facts are true:

1. I am a member of the The Florida Bar and the bars of New York and Washington, D.C., and a partner in the Miami office of Boies Schiller Flexner LLP ("BSF").
2. In December 2014, at the request of Mr. Boies, I sent a letter to Leslie Wexner regarding possible claims against him.
3. On January 6, 2015, Mr. Boies and I participated in telephonic communications with Mr. Wexner's counsel. Sigrid McCawley was not involved in the representation of Ms. Giuffre at the time and did not participate in these initial communications.
4. On March 25, 2015, Mr. Boies, Ms. McCawley and I had a telephonic conference with Mr. Wexner's counsel.
5. On July 8, 2015, Mr. Boies, Ms. McCawley and I had an in-person meeting with Mr. Wexner's counsel in New York.
6. I have read Mr. Dershowitz's claim that there was a "plot" and "conspiracy" to extort Mr. Wexner. There was no such "plot" or "conspiracy". We requested information from Mr. Wexner's counsel. At no time in my conversations or in my presence did anyone make any threat or any demand for money or anything else of value from Mr. Wexner or his counsel.
7. At no time during any meeting or call that I participated in was any settlement demand made.

FURTHER AFFIANT SAYETH NAUGHT.


STEPHEN N. ZACK

STATE OF FLORIDA)
 ss.:)
COUNTY OF MIAMI-DADE)

On this 22nd day of November 2017 before me, the undersigned, a Notary Public in and for said State, personally STEPHEN N. ZACK personally known to be or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or person upon behalf of which the individual acted, executed the instrument.


Notary Public

